

CLEMENTE M. JIMÉNEZ, ESQ.
California State Bar Number 207136
431 I Street, Suite 102
Sacramento, CA 95814
(916) 443-8055

Attorney for ROBERTO TOSTADO-CADENAS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No.: 2:22-cr-151 WBS

Plaintiff,

STIPULATION AND ORDER
VACATING DATE, CONTINUING
CASE, AND EXCLUDING TIME

JOSE ANTONIO CURIEL, et al.,

DATE: January 22, 2024

Defendants.

JUDGE: Hon. William B. Shubb

IT IS HEREBY STIPULATED by and between Assistant United States Attorney, Justin Lee, Counsel for Plaintiff, and attorneys Clemente M. Jiménez, Counsel for Defendant Roberto Tostado-Cadenas, and Megan Hopkins, Assistant Federal Defender, Counsel for Jose Antonio Curiel, that the hearing in this matter, currently scheduled for January 22, 2024, at 9:00 a.m., be vacated and the matter continued to this court's criminal calendar on March 11, 2024, at 9:00 a.m. for further status conference and possible change of plea. Counsel will require time to review discovery, conduct investigation, and confer with their respective clients in order to prepare for trial.

IT IS FURTHER STIPULATED that time within which the trial of this case must be commenced under the Speedy Trial Act, 18 U.S.C. Section 3161 et seq. be excluded from computation of time pursuant to Section 3161(h)(7)(A) and (B)(iv), (Local code T-4), from the date of the parties' stipulation, January 18, 2024, through March 11, 2024,

1 and that the ends of justice served in granting the continuance and allowing the defendant
2 further time to prepare outweigh the best interests of the public and the defendant to a
3 speedy trial.

4
5 DATED: January 18, 2024

/S/ Justin Lee
PHILLIP TALBERT
by JUSTIN LEE
Attorney for Plaintiff

6
7 DATED: January 18, 2024

/S/ Clemente M. Jiménez
CLEMENTE M. JIMÉNEZ
Attorney for Roberto Tostado-Cadenas

8
9 DATED: January 18, 2024

/S/ Megan Hopkins
MEGAN HOPKINS
Assistant Federal Defender
Attorney for Jose Antonio Curiel

10
11
12
13
14
15
16 ORDER

17 IT IS SO ORDERED, that the status conference in the above-entitled matter,
18 scheduled for January 22, 2024, at 9:00 a.m., be vacated and the matter continued for
19 further status conference and possible change of plea on **March 11, 2024, at 9:00 a.m.**
20 The Court finds that time under the Speedy Trial Act shall be excluded from the date of
21 the parties' stipulation, January 18, 2024, through March 11, 2024, to afford counsel
22 reasonable time to prepare. Based on the parties' representations, the Court finds that the
23 ends of justice served by granting a continuance outweigh the best interests of the public
24 and the defendants to a speedy trial.

25
26 Dated: January 19, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE